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5	Attorneys for Creditor 2 Tread Brewing Company		
6	Matthew W. Grimshaw, Esq. (SBN 210424) GRIMSHAW LAW GROUP, P.C. 26 Executive Park, Ste. 250 Irvine, California 92614 Telephone: (949) 734-0187 Facsimile: (208) 391-7860 Counsel for Robins Cloud LLP		
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11	UNITED STATES BANKRUPTCY COURT		
12	NORTHERN DISTRICT OF CALIFORNIA		
13	SAN FRANCISCO DIVISION		
14	In re) Case No. 19-30088 (DM)	
15 16	PG&E CORPORATION,)	
17	and) Chapter 11	
1.0	PACIFIC GAS AND ELECTRIC COMPANY) (Lead Case–Jointly Administered)	
19	Debtors)) DECLARATION OF ROBERT	
20	Affects:) BRYSON IN SUPPORT OF MOTION) FOR ORDER AUTHORIZING) WITHDRAWAL OF COUNSEL TO 2) TREAD BREWING COMPANY	
21			
22	☐ PG&E Corporation☐ Pacific Gas & Electric Company		
2324	⊠ Both Debtors)	
25	* All papers shall be filed in the Lead)	
26	Case, No. 19-30088 (DM).)	
27		_)	
28			
Ca	1 Case: 19-30088		
	of 3		

Declaration of Robert Bryson

I, Robert Bryson, say and declare as follows:

- 1. I am an individual over 18 years of age and competent to make this declaration.
- 2. I am an attorney with the law firm of Robins Cloud LP (the "Firm"), attorneys of record for 2 Tread Brewing Company ("Creditor"). I am duly admitted to practice law before all courts of the State of California and before this court.
- 3. I make this declaration in support of the Firm's motion to be relieved as counsel to Creditor in the above-captioned bankruptcy case ("Motion"). The facts set forth below are true and within the scope of my personal knowledge, and if called upon to do so I could and would testify competently to these facts.
- 4. On January 29, 2019, Debtors filed voluntary petitions commencing their bankruptcy cases.
- 5. In October 2019, the Firm filed Proof of Claim No. 29015 ("Claim") on behalf of Creditor. Since filing the Claim, the Firm has been unable to communicate with Creditor. The Firm has attempted to contact Creditor by telephone, email, and letter, all to no avail. Creditor refuses to speak or otherwise communicate with the Firm.
- 6. In the last communication from the Creditor, shortly before filing the subject Claim, the Firm was informed that the owner intended to sell the company, believed any recovery would futile, and therefore did not wish to proceed with the Claim. The Firm's subsequent multiple attempts to confirm the owner's instructions went unanswered and despite multiple attempts to contact the Creditor/owner, the firm has been unable to make contact with the Creditor/owner.
- 7. The logical inference is that an irreconcilable breakdown in the attorney-client relationship has developed and Creditor no longer desires to be represented by the Firm.
 - 8. To the extent that Creditor requests that the Firm turn over any files or

The Firm retained Grimshaw Law Group, P.C. as bankruptcy counsel to, among other things, assist it in filing this motion. Grimshaw Law Group has no contractual or attorney/client relationship with Creditor.

information that he is entitled to, the Firm will cooperate and transmit such files. 9. The Firm will cause the Motion to be served on all of the addresses provided to the Firm by Creditor or procured by the Investigator during his attempts to locate Creditor, including the following: 1018 Santa Rosa Plaza, Santa Rosa, CA 95401 I declare under penalty of perjury that the foregoing is true and correct. Executed on February 17, 2021.